

GURBIR S. GREWAL  
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*Attorney for Defendant,  
Christopher Kuberiet*

By: Jordynn Jackson  
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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
VICINAGE OF NEWARK

Nijer Parks,  Plaintiff,  v.  Christopher Kuberiet et als.,  Defendant.	Civil Action No. 2:21-CV-04021-MCA-LDW     <b>NOTICE OF MOTION TO DISMISS PLAINTIFFS' COMPLAINT PURSUANT TO FED.R.CIV.P. 12(b)(1) AND FED.R.CIV.P. 12(b)(6)</b>
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TO: CLERK OF THE COURT  
United State District Court  
District of New Jersey, Newark Vicinage  
Martin Luther King, Jr. Building & U.S. Courthouse  
50 Walnut Street, Room 4015  
Newark, New Jersey 07101

Daniel W. Sexton, Esq.  
Daniel W. Sexton, LLC.  
2229 New Centre Road  
Hillsborough, NJ 08844

Fredrick L. Rubenstein, Esq.  
James T. Nolan & Associates, LLC  
61 Green Street

Woodbridge, New Jersey 07095

Lori A. Dvorak, Esq.  
Dvorak & Associates, LLC  
467 Middlesex Avenue  
Metuchen, New Jersey 08840

PLEASE TAKE NOTICE that on June 7, 2021, the undersigned Gurbir S. Grewal, Attorney General of New Jersey, by Jordynn Jackson, Deputy Attorney General, on behalf of Defendant, Christopher Kuberiet shall move before the Honorable Madeline Cox Arleo, U.S.D.J., in the United States District Court House, Martin Luther King, Jr. Building & U.S. Courthouse 50 Walnut Street, Room 5054 Newark, New Jersey 07101, pursuant to FED.R.CIV.P. 12(b)(1) and FED.R.CIV.P. 12(b)(6), for an Order dismissing plaintiff's Complaint. Defendant will rely on the brief and certification of counsel being filed simultaneously with this Notice of Motion.

It is respectfully requested that the Court rule upon the moving papers submitted, without requiring appearance of counsel, pursuant to L. Civ. R. 78.1, unless opposition is filed by plaintiff.

A proposed form of Order is attached hereto

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY

By:

/s/ Jordynn Jackson  
Jordynn Jackson (ID 270752019)  
Deputy Attorney General

Dated: April 23, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of April, 2021, the foregoing was filed electronically with the Clerk of the United States District Court and was served upon all parties via UPS overnight mail as follows:

Daniel W. Sexton, Esq.  
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By: s/ Jordynn Jackson  
Jordynn Jackson (ID 270752019)  
Deputy Attorney General

Dated: April 23, 2021